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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated, Plaintiffs, v. META PLATFORMS, INC., a Delaware Corporation headquartered in California, Defendant.	Case No. 3:20-cv-08570-JD **DECLARATION OF AMRISH ACHARYA IN SUPPORT OF OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND *DAUBERT* BRIEFING** Judge: Hon. James Donato

No. 3:20-cv-08570-JD

DECLARATION OF AMRISH ACHARYA ISO
OMNIBUS MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH CLASS
CERTIFICATION AND *DAUBERT* BRIEFING

1   1.   I, Amrish Acharya, declare as follows:

2   2.   I am a Director of Finance at Meta Platforms, Inc. I have been employed by Meta

3 since 2015 and have held my current title since 2021. Over the course of my employment at Meta,

4 I have acquired personal knowledge of Meta's practices and procedures concerning the

5 maintenance of the confidentiality of its strategic, business, financial, technical, and marketing

6 information.

7   3.   I respectfully submit this declaration in support of the Omnibus Motion to Seal

8 Materials Submitted in Connection with the Class Certification and *Daubert* Briefing ("Sealing

9 Motion"), filed on November 21, 2023 in *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-

10 JD (N.D. Cal.).

11   4.   The facts set forth in this declaration are true and correct to the best of my

12 knowledge, information, and belief, and are based on my personal knowledge of Meta's policies

13 and practices as they relate to the treatment of confidential information, materials that were

14 provided to me and reviewed by me, or conversations with other knowledgeable employees of

15 Meta. If called upon as a witness in this action, I could and would testify from my personal

16 knowledge and knowledge acquired from sources with factual foundation.

17   5.   All the material for which Meta requests sealing is maintained as highly

18 confidential. To the best of my knowledge, none of this material has been publicly disclosed. As

19 demonstrated with factual particularity below, there are compelling reasons and good cause to seal

20 Meta's highly confidential materials.

21   6.   For the reasons stated below, this information is highly sensitive, and if publicly

22 disclosed, could significantly prejudice Meta's competitive position by harming Meta's

23 relationships with business partners, developers, and advertisers, putting Meta at unfair

24 disadvantage in future business negotiations, and permitting Meta's competitors to gain an unfair

25 advantage in competition with Meta. For example, the public disclosure of Meta's internal,

26 confidential material could reveal Meta's strategic decision-making and influence the business

27 strategies employed by Meta's competitors by enabling them to mimic Meta's confidential

28

1 strategies in an effort to attract users or advertisers away from Meta. The disclosure of Meta's

2 confidential material might also give a competitor or a potential business partner unfair leverage

3 in competing against or negotiating with Meta.

4   7.   As a matter of internal policy, Meta and its employees treat as strictly confidential:

5 (1) nonpublic business dealings with third parties, including details of negotiation strategies or

6 specific deal terms; (2) nonpublic financial data or information; (3) nonpublic pricing data or

7 information; (4) nonpublic technical functionality of Meta's products and systems; (5) internal

8 research or analyses, including proprietary methods for conducting that research or analysis; (6)

9 nonpublic business strategies, including internal analyses or discussions of in-development or

10 unreleased products, features, or future plans; and (7) other sensitive information that, if publicly

11 disclosed, could prejudice Meta's business interests. In my experience and to the best of my

12 knowledge, Meta does not disclose internal documents, data, or information of this nature outside

13 of the company, except to authorized third parties when so required or permitted by law or contract.

14   8.   The specific information Meta seeks to seal is identified in the tables below, with

15 numbered rows for the Court's ease of reference:

16

17 **EXPERT REPORTS**

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
Advertiser Class Rebuttal Report of Catherine Tucker, filed at Dkt. Nos. 642-6 (Ex. 79), 659-5 (Ex. 3), 671-11 (Ex. 10), 675-4 (Ex. 3)			
1.	Exhibit B	¶ 35, including Exhibits 3, 4, and 5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
2.	Exhibit B	¶ 36	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
3.	Exhibit B	¶¶ 38-40, including Exhibit 7	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
4.	Exhibit B	n. 57	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
5.	Exhibit B	n. 58	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
6.	Exhibit B	n. 59	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
7.	Exhibit B	n. 60	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
8.	Exhibit B	¶ 44	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
9.	Exhibit B	¶ 45	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's

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DECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND *DAUBERT* BRIEFING

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
10.	Exhibit B	Exhibit 10	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
11.	Exhibit B	n. 182	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
12.	Exhibit B	¶ 81, including Exhibit 11	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
13.	Exhibit B	¶ 124	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auctions. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
14.	Exhibit B	n. 239, from "The price" through "at -345-347"	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decisionmaking and business strategies employed by Meta's competitors in advertising.
15.	Exhibit B	¶ 127 and footnotes 241 and 242	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the

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DECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND *DAUBERT* BRIEFING

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
16.	Exhibit B	¶ 130	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
17.	Exhibit B	¶ 133	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of

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			Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
18.	Exhibit B	n. 245	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
19.	Exhibit B	n. 258-262	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
20.	Exhibit B	Exhibit E-1, p. E-5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's

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Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
User Class Rebuttal Report of Catherine Tucker, filed at Dkt. Nos. 645-19, 663-4 (Ex. 5), 669-6 (Ex. 5)			
21.	Exhibit C	¶ 84, from "A 2017 Ipsos" through the end of the paragraph, & n. 168-171	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
22.	Exhibit C	¶ 85 & n.172	This text describes Meta's future potential business plans regarding user engagement and data collection. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
23.	Exhibit C	¶ 127 & n.269	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats

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			it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
24.	Exhibit C	Exhibit 4 and notes (p. 121)	This text reflects user data calculated or derived from Meta's internal market research which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Meta. For example, if competitor platforms became aware of this information, they could use it to inform their own strategies, improperly leveraging Meta's user data in an effort to compete unfairly against Meta.
25.	Exhibit C	¶ 152	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
26.	Exhibit C	Exhibit 5 and notes (p. 123)	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
Expert Report of Yael Hochberg, filed at Dkt. No. 657-3 (Ex. 1), 677-2 (Ex. 1)			
27.	Exhibit D	¶ 50 (between "a code base that can grow and scale the company" and "Therefore, there is reason to believe…")	This text describes Meta's future and in-progress business plans with regards to its infrastructure. This information contains non-public and confidential data regarding unreleased advertising products and features development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
28.	Exhibit D	n. 76	This text describes Meta's future and in-progress business plans with regards to its infrastructure. This information contains non-public and confidential data regarding unreleased advertising products and features development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
Reply Report of Scott Fasser, filed at Dkt. Nos. 642-8 (Ex. B), 646-4 (Ex. 2), 647-4 (Ex. 2), 667-3 (Ex. 2)			
29.	Exhibit E	¶ 4, the final sentence	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the

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			trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
30.	Exhibit E	n. 2	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
31.	Exhibit E	¶ 5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
32.	Exhibit E	¶ 6, from "specific advertisement" through end	This information reveals Meta's internal non-public pricing information for advertising on Meta's products, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
		of paragraph.	likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
33.	Exhibit E	n. 4	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how advertisers use and value Meta's advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta.
34.	Exhibit E	n. 5	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
35.	Exhibit E	n. 6	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
36.	Exhibit E	n. 8	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
37.	Exhibit E	n. 9	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
38.	Exhibit E	n. 10	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
39.	Exhibit E	n. 11	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
40.	Exhibit E	¶ 9, from "threshold" through the end of the paragraph	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
41.	Exhibit E	¶ 10	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
42.	Exhibit E	¶ 11	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta
	Exhibit E	¶ 13, between "cites agreements with" and "Prof. Tucker's citations"	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
Expert Report of Michael A Williams, filed at Dkt. Nos. 642-10 (Ex. A), 646-8 (Ex. 6), 647-8 (Ex. 6), 657-5 (Ex. 7), 659-3 (Ex. 1), 661-2 (Ex. 1), 671-5 (Ex. 4), 675-5 (Ex. 4), 677-4 (Ex. 3)			
43.	Exhibit F	¶ 46	This document describes Meta's future potential business plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			decision-making and business strategies employed by Meta's competitors in advertising.
44.	Exhibit F	¶ 316	This text contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against Meta.
45.	Exhibit F	¶ 317	This document describes Meta's future potential business plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Reply Report of Michael A. Williams, filed at Dkt. Nos. 642-10 (Ex. B), 657-7 (Ex. 9), 659-7 (Ex. 5), 661-3 (Ex. 2), 671-7 (Ex. 6), 675-10 (Ex. 9)			
46.	Exhibit G	¶ 52, between "her claim is that" and "Thus, Dr. Tucker's" and n. 36	This text reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by

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			potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
47.	Exhibit G	n. 48	This text contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its advertising platform that reveal competitively sensitive information, including how advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta.
48.	Exhibit G	¶ 132 and n. 151	This text reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
Expert Report of Joshua Gans, filed at Dkt. Nos. 642-14 (Ex. A), 646-4 (Ex. 4), 647-6 (Ex. 4), 659-4 (Ex. 2), 661-8 (Ex. 7), 665-2 (Ex. 1), 671-8 (Ex. 7), 675-8 (Ex. 7)			
49.	Exhibit H	¶ 62	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public

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			information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
50.	Exhibit H	¶ 66	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
51.	Exhibit H	¶ 67, between "indicates that" and "A Snapchat executive"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
52.	Exhibit H	¶ 68	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other

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			product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
53.	Exhibit H	¶ 82, after "appears at PALM-002014263" through end of paragraph	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products and services that reveal competitively sensitive information, including how developers use and value Meta's products and services, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer unfair leverage in competing against or negotiating with Meta.
54.	Exhibit H	¶ 83, first sentence	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
55.	Exhibit H	¶ 90	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the

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			confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
56.	Exhibit H	¶ 103	This text describes Meta's future potential business plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Expert Report of Nicholas Economides, filed at Dkt. Nos. 645-5, 651-4 (Ex. 1), 652-3 (Ex. 1), 663-2 (Ex. 1), 669-7 (Ex. 6)			
57.	Exhibit I	Section X.D.2	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Reply Report of Nicholas Economides, filed at Dkt Nos. 645-6, 651-5 (Ex. 2), 652-4 (Ex. 2), 663-5 (Ex. 4), 669-14 (Ex. 13)			
58.	Exhibit J	¶ 92	This document describes future potential business plans with regard to unreleased products or

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			features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
59.	Exhibit J	¶ 113	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
60.	Exhibit J	¶ 130	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
61.	Exhibit J	¶ 190	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive

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			decision-making and business strategies employed by Meta's competitors.
Reply Report of Sarah Lamdan, filed at Dkt. Nos. 645-11			
62.	Exhibit K	¶ 28	This document described Meta's future potential business plans regarding privacy. This information contains non-public information regarding confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.

DEPOSITION TRANSCRIPTS (Economides & Tucker)

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
Transcript of Deposition of Nicholas Economides, filed in full at Dkt. No. 673-10 (Ex. 14), and excerpts thereof filed at Dkt. Nos. 651-6 (Ex. 3) and 652-5 (Ex. 3)			
63.	Exhibit L	59:8-14	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
64.	Exhibit L	93:9-20	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
65.	Exhibit L	106:10-107:8	This text describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
66.	Exhibit L	110:15-25	This text describes future potential business plans with regard to unreleased products or features.

			This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Transcript of User Plaintiffs' Deposition of Catherine Tucker, filed in full at Dkt. No. 645-15 (Ex. 75), and excerpts thereof filed at Dkt. No. 673-9 (Ex. 13)			
67.	Exhibit M	6:20-21	This text reveals the home address of Meta's expert, Catherine Tucker. Professor Tucker has a legitimate, legally recognized privacy interest in protecting her contact information from public disclosure. If her contact information were to be publicly disclosed, she may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
68.	Exhibit M	204:14-22	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its advertising platform that reveal competitively sensitive information, including how Meta's products operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta.
69.	Exhibit M	205:5-13	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its advertising platform that reveal competitively sensitive information, including how Meta's products operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm

			to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta.
70.	Exhibit M	206:18-207:12	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
71.	Exhibit M	208:24-209:10	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
72.	Exhibit M	209:21-25	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
73.	ExhACTIVEUS 201812827v.6ibit M	299:20-301:13	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed

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OMNIBUS MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH CLASS
CERTIFICATION AND *DAUBERT* BRIEFING

			publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.

OTHER FILINGS

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
Interim Administrative Motion to File Under Seal Advertiser Plaintiffs' Motion for Class Certification and Supporting Documents (Dkt. No. 642)			
74.	Exhibit N1	Dkt. No. 642-1, Advertisers' Motion for Class Certification, between "Ex. 8 at 331" and "with Ex. 9".	This text describes bilateral meetings with government officials as well as and senior executives from current and potential business partners of Meta. This text contains confidential, non-public information regarding discussions individuals who are not a party to this litigation, and who have a reasonable expectation that Meta will maintain the confidentiality of confidential statements made during potential partnership conversations.
75.	Exhibit N2	Dkt. No. 642-3, Exhibit 1, PX-2256 Zuckerberg Deposition (Volume 1 Exhibits)	This document describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors

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			conduct market research on U.S. users.
76.	Exhibit N3	Dkt. No. 642-3, Exhibit 2, PX-0414 Olivan Deposition (Volume 1 Exhibits),	This document describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
77.	Exhibit N3	Dkt. No. 642-3, Exhibit 2, PX-0414 Olivan Deposition (Volume 1 Exhibits), email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
78.	Exhibit N4	Dkt. No. 642-3, Exhibit 4, PX-2862 Priell Deposition (Volume 1 Exhibits)	This document contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has

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			never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research.
79.	Exhibit N5	Dkt. No. 642-3, Exhibit 6, PX-0020 Patel Deposition (Volume 1 Exhibits)	This document describes market research data and information obtained through proprietary sources and methods. This text reflects user data calculated or derived from Meta's internal market research which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Meta. For example, if competitor platforms became aware of this information, they could use it to inform their own strategies, improperly leveraging Meta's data in an effort to compete unfairly against Meta.
80.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition (Volume 1 Exhibits), at PALM-01460331-332, under heading 'Davos Meetings'	This text describes bilateral meetings with government officials as well as senior executives from current and potential business partners of Meta. This text contains confidential, non-public information regarding a non-party and implicates the nonparty's confidentiality interests, by revealing the identity of an individual who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of statements during potential partnership conversations.
81.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition	This text describes bilateral meetings with government officials as well as

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		(Volume 1 Exhibits), Pages PALM-01460333-338 (after "MEETINGS")	senior executives from current and potential business partners of Meta. This text contains confidential, non-public information regarding a non-party and implicates the nonparty's confidentiality interests, by revealing the identity of an individual who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of statements during potential partnership conversations.
82.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition (Volume 1 Exhibits), email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
83.	Exhibit N7	Dkt. No. 642-3, Exhibit 14, PX-1317 Chang Deposition (Volume 1 Exhibits)	This document contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users or developers use and value Meta's products, services, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer or business

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			partner unfair leverage in competing against or negotiating with Meta.
84.	Exhibit N8	Dkt. No. 642-3, Exhibit 16, PX-1322 Chang Deposition (Volume 1 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Ticketmaster. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
85.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), Pages - 856-858 (between "Section 2" and "Section 3")	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.

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86.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page PALM-012438858, "Section 3: Integration Partnerships"	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.
87.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page PALM-012438861, from "Integration Partnerships—Messenger" to "Integration Partnerships—WhatApp"	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.
88.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page PALM-012438865-66, list under "messaging functionality of Facebook:".	This text reveals the identity of specific app developers who have entered contracts with Meta. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the

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			confidentiality of contractual terms and its own confidential statements made during negotiations. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.
89.	Exhibit N10	Dkt. No. 642-3, Exhibit 20 (Volume 1 Exhibits)	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer, and implicates their confidentiality interests, by revealing the identity of a Meta developer who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
90.	Exhibit N11	Dkt. No. 642-4, Exhibit 21 (Volume 2 Exhibits)	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer, and implicates their confidentiality interests, by revealing the identity of a Meta developer who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own

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			confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
91.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), Page -190 (figure in fifth row, second column from right)	This text reveals confidential information regarding Netflix's ad spend on Meta. This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the confidential business information of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
92.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), pages PALM-011831167-68, Section	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed,

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		6 "Re-Authorization of Equity Subcommittee Delegation"	it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
93.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), pages PALM-011831168-69, Section 7 "Equity Pool Evergreen Increase"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
94.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), page PALM-011831171	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information
95.	Exhibit N13	Dkt. No. 642-4, Exhibit 25 (Volume 2 Exhibits), Page -654 (between "1." and "My recommendation")	This document describes the negotiation of specific contract terms between Meta and Netflix. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.

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96.	Exhibit N13	Dkt. No. 642-4, Exhibit 25 (Volume 2 Exhibits), Page -655 (email from Andrew Bosworth)	This document describes the negotiation of specific contract terms between Meta and Netflix. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta. This text also contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
97.	Exhibit N13	Dkt. No. 642-4, Exhibit 25 (Volume 2 Exhibits), email address of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level

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			of threats or harassment, given the current media attention on Meta.
98.	Exhibit N14	Dkt. No. 642-4, Exhibit 35 (Volume 2 Exhibits)	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
99.	Exhibit N15	Dkt. No. 642-4, Exhibit 36 (Volume 2 Exhibits)	This document describes proprietary market research and analysis on a Meta competitor. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal

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			terms designed to undercut those offered by Meta.
100.	Exhibit N16	Dkt. No. 642-4, Exhibit 38, PX-1926 Sandberg Deposition (Volume 2 Exhibits)	This document describes proprietary market research and analysis on a Meta competitor. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
101.	Exhibit N17	Dkt. No. 642-4, Exhibit 39, PX-0610 Hastings Deposition (Volume 2 Exhibits), Page -295 (between "guess that" and "CPMs is a reasonable estimate")	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
102.	Exhibit N17	Dkt. No. 642-4, Exhibit 39, PX-0610 Hastings Deposition	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or

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		(Volume 2 Exhibits), email addresses of Meta employees	former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
103.	Exhibit N18	Dkt. No. 642-5, Exhibit 42 (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
104.	Exhibit N19	Dkt. No. 642-5, Exhibit 43 (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could

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			give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
105.	Exhibit N20	Dkt. No. 642-5, Exhibit 44, PX-1704 Crum Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
106.	Exhibit N21	Dkt. No. 642-5, Exhibit 47, PX-1709 Crum Deposition (Volume 3 Exhibits)	This document describes future potential business plans and strategy with respect to header bidding. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to Meta's advertising product and feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.

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107.	Exhibit N22	Dkt. No. 642-5, Exhibit 48, excerpts from Deposition of Stephanie Wang, dated March 28, 2023 (Volume 3 Exhibits)	This document describes technical aspects of Meta's advertising products and future potential business plans regarding relationship with Google. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
108.	Exhibit N23	Dkt. No. 642-5, Exhibit 49, excerpts from Deposition of Henry Crum, dated May 25, 2023 (Volume 3 Exhibits)	This document describes technical aspects of Meta's advertising products and future potential business plans regarding relationship with Google. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
109.	Exhibit N24	Dkt. No. 642-5, Exhibit 50, PX-1295 Jakubowski Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to

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			those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
110.	Exhibit N25	Dkt. No. 642-5, Exhibit 52, PX-1708 Crum Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
111.	Exhibit N26	Dkt. No. 642-5, Exhibit 54, PX-1712 Crum Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta,

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			as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
112.	Exhibit N27	Dkt. No. 642-5, Exhibit 56, PX-1922 Sandberg Deposition (Volume 3 Exhibits)	This document contains pricing and financial information relating to Audience Network. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development and advertising business, which also arguably gives Meta's competitors an unfair advantage.
113.	Exhibit N28	Dkt. No. 642-5, Exhibit 57, PX-1921 Sandberg Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to

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			result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
114.	Exhibit N29	Dkt. No. 642-5, Exhibit 60, PX-1713 Crum Deposition (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
115.	Exhibit N30	Dkt. No. 642-6, Exhibit 61, PX-0463 Wang Deposition (Volume 4 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could

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			give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
116.	Exhibit N31	Dkt. No. 642-6, Exhibit 62, PX-0185 Rose Deposition (Volume 4 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad platform or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
117.	Exhibit N32	Dkt. No. 642-6, Exhibit 63, excerpts of Deposition of John David Jakubowski, dated April 21, 2023 (Volume 4 Exhibits)	This document describes technical aspects of Meta's advertising products and future potential business plans regarding relationship with Google. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed,

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			this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
118.	Exhibit N33	Dkt. No. 642-6, Exhibit 64, PX-0464 Wang Deposition (Volume 4 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad platform business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
119.	Exhibit N34	Dkt. No. 642-6, Exhibit 67 (Volume 4 Exhibits)	This document describes potential changes in product functionality. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
120.	Exhibit N35	Dkt. No. 642-6, Exhibit 68 (Volume 4 Exhibits)	This document describes technical aspects of Meta's infrastructure. This

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			information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and content delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
121.	Exhibit N36	Dkt. No. 642-6, Exhibit 69, PX-0119 Parikh Deposition (Volume 4 Exhibits)	This document describes technical aspects of Meta's infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and content delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
122.	Exhibit N37	Dkt. No. 642-6, Exhibit 70, excerpts from Deposition of Jay Parikh, dated March 9, 2023 (Volume 4 Exhibits)	This document describes technical aspects of Meta's infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and content delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive

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			decision-making and business strategies employed by Meta's competitors in advertising.
123.	Exhibit N38	Dkt. No. 642-6, Exhibit 72, excerpts from Deposition of Rob Goldman, dated June 13, 2023 (Volume 4 Exhibits), 26:19-22	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
124.	Exhibit N39	Dkt. No. 642-6, Exhibit 74, excerpts from Deposition of Jonathan Eide, dated May 9, 2023 (Volume 4 Exhibits)	This document describes Meta's proprietary ad measurement methodology. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
First Administrative Motion to File Under Seal Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel (Dkt. No. 645)			
125.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 6:3 (quoting Ex. 39)	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and

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			strategic considerations related to feature development . This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
126.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 6:7-10	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
127.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 8:19-21	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development . This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.

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128.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 11:16-17	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
129.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 11:21-12:6, 10-12	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development . This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
130.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 13:4-9	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information

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			could influence the competitive decision-making and business strategies employed by Meta's competitors.
131.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 14:4-5	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
132.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 21:20-26	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information confidential non-public details of Meta's product functionality and strategic considerations related to feature development . This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
133.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 22:19-20	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development . This

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			information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
134.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, p. 8, between "Facebook "cookie[s]" and "off it.";" p. 9, "between "Facebook "cookie[s]" and "off it"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
135.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, p. 12, between "Moreover, Facebook's assurance" and "backlash"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
136.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 13-14, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling

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			Meta's competitors to mimic its confidential strategies.
137.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 15-16, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
138.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 19, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
139.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 20-21, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
140.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative	This text contains confidential non-public details of Meta's product

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		Examples of Facebook's Deceptive Statements and Omissions, p. 23 between "But, Facebook's" and "use it[.]"	functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
141.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, messages sent at 20:49-20:50	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
142.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, message sent at 20:54:06	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in

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			an effort to attract users away from Meta.
143.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, messages sent at 20:56:06-20:56:16	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
144.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, message sent at 20:55:25	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
145.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, messages sent at 20:57:41-20:58:36	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal

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			strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
146.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, Exhibit 25, message sent at 21:01:26	This text reveals information about Meta's internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
147.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, Exhibit 25, message sent at 21:01:32	This text reveals information about Meta's internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including

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			summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
148.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, Exhibit 25, message sent at 21:02:30	This text reveals information about Meta's internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.

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149.	Exhibit O4	Dkt. No. 645-13, Exhibit 31, Excerpts from PALM-010069776, -777-788 (attached slide deck)	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
150.	Exhibit O4	Dkt. No. 645-13, Exhibit 31, Excerpts from PALM-010069776, email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
151.	Exhibit O5	Dkt. No. 645-13, Exhibit 35, Excerpts from PALM-011140935, text under "Analysis Takeaways"	This text describes the technical function of Meta's advertising platforms and systems. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could

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			influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
152.	Exhibit O6	Dkt. No. 645-13, Exhibit 36, Excerpts from PALM-012003899	This document describes Meta's future potential business plans with respect to compliance with regulatory oversight. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to product and feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
153.	Exhibit O7	Dkt. No. 645-13, Exhibit 37	This text describes Meta's confidential business strategy regarding data collection, privacy, and security. This information contains non-public information regarding Meta's confidential non-public details of Meta's confidential product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
154.	Exhibit O8	Dkt. No. 645-14, Exhibit 38, Pages -183-185	This text includes descriptions of Meta's business plans for data use design on Meta's Facebook, Instagram, and Messenger apps. This information contains confidential, non-public information regarding Meta's internal business strategies

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			and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, and services how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a competitor unfair leverage in competing against Meta.
155.	Exhibit O8	Dkt. No. 645-14, Exhibit 38, email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
156.	Exhibit O9	Dkt. No. 645-14, Exhibit 39, Excerpts from PALM-012846445	This document describes Meta's future potential business plans with respect to compliance with regulatory oversight. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to product and feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact

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			Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
157.	Exhibit O10	Dkt. No. 645-14, Exhibit 41, Excerpts from PALM-012991911, Pages -912-917 (after "FB App proposal on privacy & trust")	This text describes Meta's future potential business plans and internal analyses regarding privacy policies and practices. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
158.	Exhibit O10	Dkt. No. 645-14, Exhibit 41, Excerpts from PALM-012991911, email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
159.	Exhibit O11	Dkt. No. 645-14, Exhibit 42, Excerpts from PALM-013003886	This document describes Meta's future potential business plans with respect to compliance with EU and India regulatory oversight on data use restrictions. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to Meta's feature development. This

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OMNIBUS MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH CLASS
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			information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
160.	Exhibit O12	Dkt. No. 645-14, Exhibit 48	This document describes Meta's confidential business plans regarding Meta's data use strategy. This information contains non-public details of Meta's product functionality and strategic considerations. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
161.	Exhibit O13	Dkt. No. 645-14, Exhibit 54, Excerpts from PALM-017069195	This document describes Meta's future potential business plans for responding to Apple's App Tracking Transparency program. This information contains non-public details and confidential data relating to Meta's product functionality and strategic considerations. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
162.	Exhibit O14	Dkt. No. 645-15, Exhibit 62, excerpts of Chen Deposition Transcript, p. 62:7-16	This text reveals information about Meta's internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including

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			summaries and discussions of Meta's internal modeling and assessments of its products, that reveal competitively sensitive information, including how developers use Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, unfair leverage in competing against or negotiating with Meta.
163.	Exhibit O14	Dkt. No. 645-15, Exhibit 62, excerpts of Chen Deposition Transcript, Pages 92-105	This text reveals information about Meta's internal risk assessments and strategies for addressing that risk. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, that reveal competitively sensitive information, including how developers use Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, unfair leverage in competing against or negotiating with Meta.
Administrative Motion to File Under Seal Portions of Meta's Motion to Exclude the Testimony of Scott Fasser and Joshua S. Gans (Dkt. No. 646)			
164.	Exhibit P1	Dkt. No. 646-5, Exhibit 3, excerpt of Fasser Deposition Transcript, 23:20-24:1	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends

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			significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
165.	Exhibit P1	Dkt. No. 646-5, Exhibit 3, excerpt of Fasser Deposition Transcript, 145:20-146:14	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
166.	Exhibit P1	Dkt. No. 646-5, Exhibit 3, excerpt of Fasser Deposition Transcript, 148:2-5	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to

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			disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
167.	Exhibit P1	Dkt. No. 646-5, Exhibit 3, excerpt of Fasser Deposition Transcript, 150:2-7	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
168.	Exhibit P2	Dkt. No. 646-11, Exhibit 9, excerpts of Bosworth Deposition Transcript, 174:1-8	This text reveals confidential information about the technical functionalities of Meta's ad auction. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could

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			influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
169.	Exhibit P3	Dkt. No. 646-12, Exhibit 10, excerpts of Goldman Deposition Transcript, 26:19-22	This text reveals confidential information about the technical functionalities of Meta's ad auction. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
170.	Exhibit P4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 275:8-13	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, that reveal competitively sensitive information, including how users use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer unfair leverage in competing against or negotiating with Meta.

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171.	Exhibit P4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 278:22-23	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
172.	Exhibit P4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 279:5-17	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Administrative Motion to File Under Seal Certain Exhibits to the Supplemental Declaration of David Z. Gringer in Support of Meta's Motion to Exclude the Testimony of Nicholas Economides (Dkt. No. 655)			
173.	Exhibit Q1	Dkt. No. 655-3, Exhibit 8, excerpts of Zuckerberg Deposition Transcript, Pages 52-53	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If

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			publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
174.	Exhibit Q2	Dkt. No. 655-4, Exhibit 9, excerpts of Baser Deposition Transcript, 269:24-273:25	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Interim Administrative Motion to File Under Seal Opposition to Meta's Motion to Exclude Testimony of Scott Fasser and Joshua Gans (Dkt. No. 667)			
175.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 1:20-24, between "(Ex. 1, ¶¶ 6-7)" and "*Id.*, ¶¶ 7-11"	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta

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176.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 5:18-21	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
177.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 6:1-4	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
178.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 6:6-7	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely

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			to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
179.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 7:24-8:2	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
180.	Exhibit R2	Dkt. No. 667-4, Exhibit 3	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

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181.	Exhibit R3	Dkt. No. 667-6, Exhibit 5	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
182.	Exhibit R4	Dkt. No. 667-7, Exhibit 6	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
183.	Exhibit R5	Dkt. No. 667-8, Exhibit 7	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be

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			determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
184.	Exhibit R6	Dkt. No. 667-9, Exhibit 8	This document describes confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development, which also arguably gives Meta's competitors an unfair advantage.
Interim Administrative Motion to File Under Seal Opposition to Users' Motion for Class Certification and Accompanying Exhibits (Dkt. No. 669)			
185.	Exhibit S1	Dkt. No. 669-1, Meta's Opp to Users' Motion for Class Cert, 8:27-9:3	This text describes Meta's future potential business plans regarding data collection from users. This information contains non-public information regarding Meta's confidential non-public internal

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			strategic considerations related to creating value for and attracting users to Meta's products. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
186.	Exhibit S2	Dkt. No. 669-13, Exhibit 12	This document describes future potential business plans with regard to unreleased products and features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Interim Administrative Motion to File Under Seal Opposition to Advertiser Plaintiffs' Motion for Class Certification and Accompanying Exhibits (Dkt. No. 671)			
187.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion, 7:4-6	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies

DECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND *DAUBERT* BRIEFING

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			employed by Meta's competitors in advertising.
188.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion, 15:12 from "Custom" to "class period"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
189.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion, 15:20 from "was associated" to "spend"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
190.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion,	This information reflects and is calculated from internal, nonpublic

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		15:22 from "made up" to "class period"	Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
191.	Exhibit T2	Dkt. No. 671-2, Exhibit 1, excerpts of Fasser Deposition Transcript, 145:20-146:14	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
192.	Exhibit T2	Dkt. No. 671-2, Exhibit 1, excerpts of Fasser Deposition Transcript, 148:2-5	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the

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			company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
193.	Exhibit T3	Dkt. No. 671-3, Exhibit 2, Advertiser Plaintiffs' Corrected First Supp Responses and Objections	This document describes Meta's assessments of business risks and potential strategies to address risks. This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
194.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams Deposition Transcript, 88:3-89:25	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly

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			utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
195.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams Deposition Transcript, 115:1-5	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
196.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams Deposition Transcript, 157:4-14	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

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197.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams Deposition Transcript, 163:2-7	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
Interim Administrative Motion to File Under Seal Materials ISO Consumers' Opposition to Facebook's Motion to Exclude Testimony of Nicholas Economides (Dkt. No. 673)			
198.	Exhibit U1	Dkt. No. 673-1, Consumers' Opp to Motion to Exclude Testimony of Nicholas Economides, 3:9-17	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
199.	Exhibit U2	Dkt. No. 673-4, Exhibit 8, PX-0046 Fernandes Deposition	This document describes future potential business plans with regard to unreleased products or features.

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			This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
200.	Exhibit U3	Dkt. No. 673-5, Exhibit 9, PX-1097 Levy Deposition	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
201.	Exhibit U4	Dkt. No. 673-6, Exhibit 10, PX-2423 Egan Deposition	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business

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			strategies employed by Meta's competitors.
202.	Exhibit U5	Dkt. No. 673-7, Exhibit 11, PX-2214 Naveh Deposition	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
203.	Exhibit U6	Dkt. No. 673-8, Exhibit 12, Excerpts from PX-2254 Zuckerberg Deposition PALM-013818575	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Interim Administrative Motion to File Under Seal Meta's Opposition to Advertiser Plaintiffs' Motion to Exclude Tucker (Dkt. No. 675)			
204.	Exhibit V	Dkt. No. 675-11, Exhibit 10, Excerpts of Schultz Deposition Transcript	This document describes technical aspects of Meta's data infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			functionalities and processes of Meta's data processing systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Interim Administrative Motion to File Under Seal Advertiser Plaintiffs' Opposition to Meta's Motion to Exclude Kreitzman and Williams (Dkt. No. 679)			
205.	Exhibit W1	Dkt. No. 679-5, Exhibit 12	This document reveals confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development and advertising business, which also arguably gives Meta's competitors an unfair advantage.
206.	Exhibit W2	Dkt. No. 679-6, Exhibit 13	This document reveals confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development and advertising business, which also arguably gives Meta's competitors an unfair advantage.
Interim Administrative Motion to File Under Seal Meta's Reply ISO Motion to Exclude Fasser and Gans (Dkt. No. 683)			
207.	Exhibit X	Dkt. No. 683-4, Exhibit 16, Excerpts from the Gans Deposition Transcript, 275:14-16	This document describes specific contract terms between Meta and an advertiser. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
Interim Administrative Motion to File Under Seal Advertiser Plaintiffs' Reply ISO Motion for Class Certification (Dkt. No. 688)			

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208.	Exhibit Y1	Dkt. No. 688-5, Exhibit 6, Excerpts from the 30(b)(1) Deposition of Alex Schultz	This document describes technical aspects of Meta's data infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's data processing systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
209.	Exhibit Y2	Dkt. No. 688-7, Exhibit 8, PALM-003309653	This document reveals confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development and advertising business, which also arguably gives Meta's competitors an unfair advantage.
210.	Exhibit Y3	Dkt. No. 688-8, Exhibit 9, PALM-005037545	This document describes specific contract terms between Meta and an advertiser. This text contains non-

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
211.	Exhibit Y4	Dkt. No. 688-9, Exhibit 10, PALM-013912488	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
212.	Exhibit Y5	Dkt. No. 688-10, Exhibit 11, PALM-000777305	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Interim Administrative Motion to File Under Seal Reply in Support of Meta's Motion to Exclude the Testimony of Nicholas Economides and Accompanying Exhibits (Dkt. No. 694)			
213.	Exhibit Z	Dkt. No. 694-1, Meta's Reply ISO Meta's Motion to Exclude the Testimony of Nicholas Economides, 4:23-24, between "was" and "offers"	This text describes confidential financial information and data relating to Meta's advertising products. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
214.	Exhibit Z	Dkt. No. 694-1, Meta's Reply ISO Meta's Motion to Exclude the Testimony of Nicholas Economides, 5:8-25 (quotations from PALM Bates-stamped documents)	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.

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Interim Administrative Motion to File Under Seal Advertiser Plaintiffs' Corrected Reply ISO Motion for Class Certification (Dkt. No. 699)			
215.	Exhibit AA1	Dkt. No. 699-5, Exhibit 6, Excerpts from the 30(b)(1) Deposition of Alex Schultz	This document describes technical aspects of Meta's data infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's data processing systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
216.	Exhibit AA2	Dkt. No. 699-7, Exhibit 8, PALM-003309653	This document reveals confidential financial information. This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development and advertising business, which also arguably gives Meta's competitors an unfair advantage.

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
217.	Exhibit AA3	Dkt. No. 699-8, Exhibit 9, PALM-005037545	This document describes specific contract terms between Meta and an advertiser. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
218.	Exhibit AA4	Dkt. No. 699-9, Exhibit 10, PALM-013912488	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
219.	Exhibit AA5	Dkt. No. 699-10, Exhibit 11, PALM-000777305	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential,

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

1   I declare that the foregoing is true and correct under penalty of perjury.

2   Executed on this 20th day of November, 2023, in San Francisco, California.

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6   By: _____

7   Amrish Acharya

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28   No. 3:20-cv-08570-JD   DECLARATION OF AMRISH ACHARYA ISO
                                                OMNIBUS MOTION TO SEAL MATERIALS
                                                SUBMITTED IN CONNECTION WITH CLASS
                                                CERTIFICATION AND *DAUBERT* BRIEFING

1

SIGNATURE ATTESTATION

2

This document is being filed through the Electronic Case Filing (ECF) system by attorney

3

Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing

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of this document from the signatory.

By: */s/ Sonal N. Mehta*

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Sonal N. Mehta

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No. 3:20-cv-08570-JD

DECLARATION OF AMRISH ACHARYA ISO
OMNIBUS MOTION TO SEAL MATERIALS
SUBMITTED IN CONNECTION WITH CLASS
CERTIFICATION AND *DAUBERT* BRIEFING